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DEPARTMENT OF NATURAL RESOURCES

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Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

January 11, 2015

Michael Dalley
Staker Parson Companies
89 West 13490 South, Suite 100
Draper, Utah 84020

Subject: Completeness Review of Notice of Intention to Commence Large Mining Operations, Staker Parson Companies, Heber Binggeli Mine, M/051/0015, Wasatch County, Utah

Dear Mr. Dalley:

The Division of Oil, Gas and Mining has completed a review of the referenced Notice of Intention to Commence Large Mining Operations which was received December 9, 2012. The attached comments will need to be addressed before tentative approval may be granted.

The comments are listed under the applicable Minerals Rule heading; please format your response in a similar fashion. Please address those items requested in the attached technical review by submitting replacement pages for the Notice of Intention to Commence Large Mining Operations (Notice) using redline and strikeout text. When the Notice is determined technically complete, the Division will ask that you submit two clean copies of the complete and corrected plan. Upon final approval, both copies will be stamped approved, and one will be returned for your records.

Please submit your response to this review by April 8, 2016.

The Division will suspend further review of the Notice until receiving your response to this letter. Please contact Leslie Heppler at 801-538-5257 or me at 801-538-5261 if you have questions about this process or about the review. Thank you for your cooperation.

Sincerely,

Paul B. Baker
Minerals Program Manager

PBB: lah: eb

Attachment: Review

cc: Mike George, Harry Campbell, Matt Garn, and Dan Hall, DEQ (mmgeorge@utah.gov hcampbell@utah.gov, mgarn@utah.gov, dhall@utah.gov)

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**COMPLETENESS REVIEW OF NOTICE OF INTENTION
TO COMMENCE LARGE MINING OPERATIONS**

**Staker Parson Companies
Heber Binggeli Quarry**

**M/051/0015
January 11, 2016**

General Comments:

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
1	All	Thank you for formatting the submittal to easily incorporate additional revisions and amendments. No further response needed	lah	
2	All	Please complete all items in highlighted red text. The Division may have additional comments based on items not yet received but required by R647.	lah	
3	All	This review contains comments about items included in the Notice of Intention, and there are several acknowledged incomplete portions of the Notice. The "non-com" designation in the second column is associated with items which cannot be reviewed at this time.	lah	
4	Cover Page	The "Heber City" was a mine name for a Small Mine Operation (SMO) both the Bond and the Reclamation Contract are both listed as "Heber Binggelli" with a permit ID of M/051/0014. The 3 documents need to have the same name. Heber city is also named throughout the permit (including appendixes); it is the recommendation of the Division to use a more generic term for the mine. Please do a search and rename.	lah	
5	Page 4	Based on the current configuration of the pits, a minimum of six cross sections should be need, but the number cannot be confirmed without the cross sections to review. Please note multiple cross sections can be put on a single page. The Division recommends no vertical exaggeration as it is difficult for non-engineers to understand. All cross sections need to be readable and scalable.	lah	

R647-4-104 – Operator Information and Surface and Mineral Ownership

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
6	Page 6	Further define Section 23 as NE¼ of the NE¼; Section 14 as S½ of SE¼; and Section 13 as the S½. (The comment is based on the cultural resources survey map.)	lah	
7	Page 7	Landowners can't be verified without Figure 2.	lah	
8	Page 8	Why haven't the land, mineral and adjacent landowners been notified?	lah	

R647-4-105 - Maps, Drawings & Photographs

General Map Comments

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
9	non-com	No comment until figures have been received.	lah	

105.1 - Topographic base map, boundaries, pre-act disturbance

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
10		No comment until figures have been received.	lah	

105.2 - Surface facilities map

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
11		No comment until figures have been received.	lah	

105.3 - Drawings or Cross Sections (slopes, roads, pads, etc.)

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
12		No comment until figures have been received.	lah	

R647-4-106 - Operation Plan

General Operation Comments

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action

106.1 - Minerals mined

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action

106.2 - Type of operations - mining method, onsite processing, deleterious or acid-forming materials

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Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
13	Page 11 Para 2 & 3	Please include both the ready mix plant equipment maintenance.	lah	

106.3 - Estimated acreages disturbed, reclaimed, annually/sequentially

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
14	non-com	Information missing.		
15	Table 1 and 104.4	Under the operator's text in section 106.4, "Historic" and early 1990's are used in the same paragraph. To clarify, mining in the 1990's is not "historic mining." Please change the text from " <u>Prior Disturbance due to Historic Mining</u> " to " <u>Prior Mining Disturbance</u> ," and Table 1 should refer to Existing Mine Disturbance. Due to the lack of information, it is difficult to evaluate the table and text as written.	lah	

106.4 - Nature of materials mined or processed (including waste materials), and estimated annual tonnages

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
16	non-com	Previously mined areas mentioned in text should be displayed on a map		

106.5 - Existing soil types, location, amount

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
17	non-com	Soil sampling locations should be displayed on a map, and this map should be referenced in the text discussion.		

106.6 - Plan for protecting & re-depositing soils

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
18	non-com	Show soil redistribution on the reclamation plan map.		
19	Page 13 & page 22	Based on photos from the area, there should be more than six inches of topsoil available to deposit. More than two samples are needed for a site the size of the disturbance. Not all samples need to be analyzed for chemistry, but soil depths and chemistry will vary from the areas over the rock versus the area over the alluvial fill.	lah	

106.7 - Existing vegetation - species and amount

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action

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106.8 - Depth to groundwater, extent of overburden, geologic setting

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
20	Page13 & 14	Geology text should refer in the text to the geology map. (noted as Figure 4 in the Table of Contents). Geology should include a brief regional setting, with a more detailed explanation of the quarry area. Geology in Utah Valley or on the top of Mount Timpanogos is interesting, but factual geologic information from the mine should be provided. The information provided should match the geologic map.	lah	

106.9 - Location & size of ore and waste piles, tailings, ponds

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
21	non-com	Required information is missing.		
22	Page 14	Rewrite the third sentence to, "There will be no waste stockpiles, tailings, treatment ponds, and discharges generated on the mine site."	lah	

106.10 - Amounts of material extracted or moved (including ore, waste, topsoil, etc.)

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
23	Page 15	Section 106.10 is to be addressed under 106.9, so change the header to " <u>106.9 & 106.9....</u> "	lah	

R647-4-109 - Impact Assessment

109.1 – Projected impacts to surface & groundwater systems

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
24	non-com	A SWPPP map is needed for the surface water impacts assessment; please expand on the protections to be employed in managing run-on "as much as possible." There are conflicting statements regarding ground water depths in Sections 109.1 and 106.8.		

109.2 – Potential impacts to threatened & endangered wildlife/habitat

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
25	Page 17 & App D	When will the wildlife surveys be done?	lah	

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109.3 – Projected impacts on existing soils resources

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Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
26	Page 17	It is unclear why the operator believes the topsoil will not have erosional and stability problems at the proposed angle. A more important concern to the Division is the height of the stockpiles.	lah	
27	Page 17 & Appendix G	Please label the table in Appendix G as Table 4 which is noted in the text on page 17.	lah	

109.4 – Projected impacts on slope stability, erosion control, air quality, public health and safety

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
28	Page 18	The current rock slope is steeper than 2H:1V; please clarify in the text and add statements which clarify slope angles during mining and final slope angles for reclamation.	lah	

109.5 - Actions to mitigate any impacts

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
29	non-com	How will impacts to surface waters be mitigated during mine operation?		
30	Omission	The mine site has one of the best berms, in the state, which mitigates impacts to the public. The Division suggests that Staker should take credit for the reclamation work that has been done on the site and include this in the Notice.	lah	
31	Page 19	Please add verbiage under Section 109.5, such as "Mitigation actions for 109.1, 109.2, 109.3 and 109.4 are discussed in each listed section."	lah	

R647-4-110 - Reclamation Plan

110.1 - Current & post mining land use

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
32	non-com	Please identify the pre-mining land use. It appears that much of the mined area, other than the hillside cut, would be suitable for agriculture rather than grazing and wildlife habitat.		

110.2 – Reclamation of roads, highwalls, slopes, impoundments, drainages, pits, piles, shafts, adits, etc

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
33	non-com	The grading plan needs to be determined for review.		
34	Page 20 omission	Please refer to the cross sections Figures 9, 10 and 11 under the highwall section.	lah	

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Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
35	Page 20	No changes are needed (i.e. delete the red text "to be determined..."). As the text is currently written, the text only needs to be supported by proposed cross sections.	lah	

110.3 - Facilities to be left for post mining use (buildings, utilities, roads, pads, ponds, pits, equipment, etc.)

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
26	Page 21& Page 20	The Division would like more information about the "ravines" noted in the text. Perhaps labeling them on the map would help.	lah	
27	Table 3	The items in this table need to be reclaimed with the mine. They also need to be included in the reclamation cost estimate until they are demolished or removed from the site.	pbb & lah	
28	Table 4	There is a Table 4 listed in the text as being in Appendix G (noted in an above review comment). Please have only one Table 4. The Division recommends that page 17 be changed.	lah	

110.4 - Description or treatment/location/disposition of deleterious or acid forming materials, including map

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
29	Page 22	Hazardous materials need to be identified in the reclamation cost estimate.	lah	

110.5 - Revegetation planting program

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
30	Page 22	The seed table is listed twice, and the Division recommends only having it in one place in the Notice. Please remove Appendix G (and all references throughout the text). On page 17 simply refer to Table 5.	lah	

110.6 – Commitment to reclaim

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
31	non-com	Statement committing operator to reclaim is missing		

R647-4-112 - Variance

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
32		No variances requested – no further action is needed	lah	

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R647-4-113 – Surety

Comment #	Sheet/Page/Map/Table #	Comments	Initials	Review Action
33	non-com	Surety calculations will be required prior to final approval.		
34	Appendix I	Please use the Division's 2016 spreadsheets provided on the Division's web site.	lah	